

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF LOUISIANA**

**UNITED STATES OF AMERICA**

**\* CRIMINAL NO. 13-227**

**v.**

**\* SECTION: "B"(1)**

**STANLEY SCOTT**

**\***

**a/k/a "Stizzle"**

**SHAWN SCOTT**

**\***

**a/k/a "Shizzle"**

**AKEIN SCOTT**

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**a/k/a "Keemy"**

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**FACTUAL BASIS**

Should this matter proceed to trial, the United States would prove beyond a reasonable doubt, through credible testimony and reliable evidence, the following facts. Unless stated otherwise, these acts occurred in the Eastern District of Louisiana:

Special Agents from the Bureau of Alcohol, Tobacco, Firearms and Explosives ("ATF") began an investigation into the Frenchmen/Derbigny gang, or "FnD," in approximately March 2013. The investigation concerned federal firearm and narcotics violations. During the course of this investigation, agents reviewed numerous police reports, 911 calls, recorded telephone calls, surveillance video, and interviewed numerous cooperating witnesses. Based on this investigation, ATF agents learned that Travis Scott, a/k/a "Trap," a/k/a "Slim," **STANLEY SCOTT, a/k/a "Stizzle," SHAWN SCOTT, a/k/a "Shizzle,"** and **AKEIN SCOTT, a/k/a "Keemy,"** were members of FnD. The leader of FnD was Travis Scott. Other FnD members include Crystal Scott, a/k/a "Chris," Jeremiah Jackson, a/k/a "Rocky," Brian Benson, a/k/a "Dub," a/k/a "Dubba," Gralen Benson, a/k/a "Dooley," Richmond Smith, a/k/a "Ace," and

others. During the course of the conspiracy, FnD members sold heroin, crack cocaine, marijuana, and other illegal drugs near the intersection of Frenchmen and North Derbigny Streets in New Orleans. FnD members often sold drugs in the Frenchmen Meat Market, a convenience store located at the corner of Frenchmen and North Derbigny Streets.

FnD, including its leadership, membership, and associates, constituted an “enterprise,” as defined by Title 18, United States Code, Section 1961(4), that is, a group of individuals that were associated-in-fact. FnD constituted an ongoing organization whose members functioned as a continuing unit for a common purpose of achieving the objectives of the enterprise. This enterprise was engaged in, and its activities affected, interstate and foreign commerce. The conspiracy extended from prior to June 26, 2006, continuing through on or about March 10, 2014. During the course of the conspiracy, the members of FnD engaged in numerous racketeering acts in furtherance of the enterprise.

A principal objective of FnD was to obtain as much money and things of value as possible through the trafficking of controlled substances, including cocaine base (“crack cocaine”), heroin, and marijuana. It was further an objective of the enterprise to threaten violence and to commit acts of violence, for the following purposes, among others: enriching the members and associates of the enterprise through, among other things, the illegal distribution of controlled substances in the territory controlled by the enterprise; preserving and protecting the power, territory and profits of the enterprise through the use of intimidation, violence, and threats of violence; promoting and enhancing the activities and authority of the enterprise and its members and associates; keeping rivals, victims, and witnesses in fear of the enterprise and its members; providing financial support and information to members and associates of the enterprise; providing assistance to members and associates of the enterprise in order to avoid detection and apprehension by law enforcement.

Under Travis Scott's leadership, FnD controlled an area bounded by Elysian Fields Avenue, North Johnson Street, the I-10 Interstate Highway, St. Anthony Street, and North Claiborne Avenue. FnD members used violence and intimidation to maintain control of this area in furtherance of FnD's illegal drug distribution activities. Cooperating witnesses would testify that no other individuals could sell illegal drugs in that neighborhood without the permission of Travis Scott and FnD members. Travis Scott would direct members of FnD to commit crimes of violence against rival gang members in order to preserve FnD's control over the neighborhood. FnD's rival gangs included the Prieur Columbus Boys ("PCB"), the 110ers, and other gangs. FnD members stored firearms at several abandoned houses near the intersection of Frenchmen and N. Derbigny Streets. Members of FnD possessed, used, carried, and discharged firearms in furtherance of their drug trafficking activities in an effort to protect their drug turf, to retaliate against other neighborhood drug groups, and for the purpose of maintaining and increasing their position in the enterprise.

The Government would present evidence from cooperating witnesses regarding the operations of the FnD gang. Cooperating witnesses would testify that FnD members Travis Scott, **STANLEY SCOTT**, **SHAWN SCOTT**, **AKEIN SCOTT**, Jeremiah Jackson, Richmond Smith, Gralen Benson, Brian Benson, Crystal Scott, and other FnD members sold heroin, crack cocaine, and other illicit drugs in the FnD territory. These witnesses would identify the Frenchmen Meat Market, located at Frenchmen and N. Derbigny Streets, as the hub of FnD's illegal drug distribution activities. The witnesses would testify that the store workers would allow customers to exchange food stamps (in the form of electronic benefit transfer (EBT) cards) for cash. Some customers would then use that cash to buy illegal drugs from FnD members. During the course of the conspiracy, FnD members distributed over one kilogram of heroin and

over 280 grams of cocaine base (crack cocaine).

Cooperating Witness #1 (CW1) was a resident of the Seventh Ward in 2005. He/she would identify Travis Scott as a member of FnD as early as 2005. CW1 would also testify that he/she observed Travis Scott and other members of FnD selling drugs at the corner store located at Frenchmen and N. Derbigny Streets in 2005.

Cooperating Witness #2 (CW2) moved to the Seventh Ward in 2005. CW2 would testify that he/she observed Travis Scott selling drugs outside the store located at the corner of Frenchmen and N. Derbigny Streets in 2005. CW2 would testify that he/she knew Travis Scott because as a young man Travis Scott played sports at Hunter's Field.

Cooperating Witness #3 (CW3) and Cooperating Witness #4 (CW4) would testify that Travis Scott would purchase heroin from Merle Offray, who was a high-level heroin supplier in the New Orleans area. CW3 would testify that Travis Scott would purchase up to nine ounces (approximately 252 grams) of heroin every three weeks from Merle Offray between 2010 and 2013. Travis Scott purchased the heroin from Merle Offray for resale to street level customers. CW4 would testify that he/she observed other members of FnD accompany Travis Scott with firearms for protection while Travis Scott purchased heroin from Merle Offray. These individuals included **STANLEY SCOTT**. CW4 would testify that he/she would borrow firearms from Travis Scott and other FnD members, including an AK-style rifle with a 100-round magazine drum that Travis Scott referred to as the "monkey nuts."

Cooperating Witness #5 (CW5) and Cooperating Witness #6 (CW6) worked in the neighborhood where FnD operated from 2012 through 2013. CW5 and CW6 would testify that Travis Scott is the leader of FnD, and that members of FnD sold heroin from the Frenchmen Meat Market. CW5 has seen Travis Scott with a gun while doing hand-to-hand drug

transactions in the store. CW5 would testify that Travis Scott would have store workers hold guns behind the counter for him at the Frenchmen Meat Market. CW5 has seen **STANLEY SCOTT**, **SHAWN SCOTT**, and **AKEIN SCOTT** conducting hand-to-hand drug transactions inside and outside the Frenchmen Meat Market. CW5 has also seen **SHAWN SCOTT** and **AKEIN SCOTT** holding firearms inside the store.

Cooperating Witness #7 (CW7) also worked in the neighborhood where FnD operated from 2012 through 2014. CW7 would testify that Travis Scott was the leader of FnD. CW7 saw Travis Scott, **STANLEY SCOTT**, **SHAWN SCOTT**, and **AKEIN SCOTT** selling drugs inside and around the Frenchmen Meat Market. CW7 also was aware that FnD members kept firearms while they were selling drugs in the Seventh Ward. CW7 would testify that the owners of the Frenchmen Meat Market would allow customers to exchange EBT/food stamp credits in return for cash, and that the owner of the Frenchmen Meat Market bragged to CW7 about the amount of money that he made through food stamp fraud.

Cooperating Witness #8 (CW8) likewise worked in the neighborhood where FnD operated from 2012 through 2014. CW8 would identify Travis Scott as the leader of FnD. CW8 was aware that Travis Scott and his brothers, **STANLEY SCOTT**, **SHAWN SCOTT**, and **AKEIN SCOTT**, sold drugs in the Frenchmen Meat Market. CW8 would testify that the owners of the Frenchmen Meat Market would allow customers to exchange EBT/food stamp credits in return for cash, and that some customers would then use that cash to purchase drugs from FnD members.

Cooperating Witness #9 (CW9) is a former heroin user who previously bought heroin from Travis Scott and other members of FnD. CW9 would testify that he/she purchased heroin intermittently from Travis Scott from approximately 2005 until 2012. When CW9 bought

heroin from Travis Scott, CW9 would purchase 3-5 grams of heroin per day. CW9 would testify that FnD controlled the neighborhood and would not allow any people unaffiliated with their gang to sell heroin in the area through threats of violence. CW9 would testify that Travis Scott preferred to sell his heroin in plastic bags instead of wrapped in aluminum foil in order to be distinctive from other heroin dealers. CW9 would testify that, on or about 2007 or 2008, Travis Scott introduced a two-for-one heroin deal to regular customers that Travis Scott called "Two for Tuesdays" or "Obama Tuesdays." Travis Scott would only offer this deal to regular customers as a means of enforcing loyalty among his heroin customers. CW9 would further testify that store workers at the Frenchmen Meat Market would allow customers to use EBT/food stamp cards to obtain cash, which then some customers would use to buy drugs from FnD members in the store. CW9 would also testify that **SHAWN SCOTT** would also sell heroin around the Frenchmen Meat Market. CW9 would testify that **AKEIN SCOTT** was a young man when CW9 was buying heroin, but that FnD members would give **AKEIN SCOTT** guns to hold because **AKEIN SCOTT** would be treated leniently by authorities as a juvenile if he were arrested.

Cooperating Witness #10 (CW10) is a former member of FnD. CW10 would testify that he/she sold heroin with Travis Scott intermittently from 2008 through 2012. CW10 would testify that Travis Scott sold heroin in plastic bags instead of aluminum foil. Beginning in 2008, Travis Scott would sell 10-25 grams of heroin per day, and he would make \$1000-\$2500 per day from heroin sales. CW10 would testify that, around 2008, Travis Scott introduced a two-for-one deal for regular customers called "Obama Tuesdays." In 2012, CW10 saw Travis Scott packing and compressing approximately nine ounces of heroin using a "jack," i.e., a hydraulic shop press. On one occasion in 2012, Travis Scott directed CW10 and **STANLEY**

**SCOTT** to intimidate a group of drug dealers on St. Anthony Street who were encroaching on the turf of FnD. CW10 and **STANLEY SCOTT** followed Travis Scott's direction and coerced the rival dealers to leave the area by waving guns at them. CW10 would testify that **STANLEY SCOTT** also sold heroin as a member of FnD. CW10 once observed **STANLEY SCOTT** holding nine ounces of heroin for Travis Scott, and **STANLEY SCOTT** had access to Travis Scott's stash of heroin located outside of the Frenchmen Meat Market. CW10 would identify **SHAWN SCOTT** as a member of FnD who sold both heroin and crack cocaine in and around the Frenchmen Meat Market. CW10 would also identify **AKEIN SCOTT** as a member of FnD. While CW10 did not witness **AKEIN SCOTT** selling drugs, he/she saw **AKEIN SCOTT** holding firearms in and around the Frenchmen Meat Market.

Cooperating Witness #11 (CW11) and Cooperating Witness #12 (CW12) are former members of FnD. They would testify that during the conspiracy, Travis Scott, **STANLEY SCOTT**, **SHAWN SCOTT**, **AKEIN SCOTT**, and other FnD members also sold heroin and/or crack cocaine in the FnD territory. FnD members made many of their illicit drug sales from the convenience store located at the intersection of Frenchmen and N. Derbigny Streets. CW11 and CW12 would testify that the owners of the Frenchmen Meat Market would allow customers to use EBT/food stamp credits to obtain cash, and these customers would occasionally then buy drugs from FnD members using that cash.

Cooperating Witness #13 (CW13), an associate of FnD, would identify Travis Scott as the leader of FnD. **SHAWN SCOTT**, **STANLEY SCOTT**, and **AKEIN SCOTT** were also members of FnD. CW13 would testify that FnD members have sold heroin, crack cocaine, marijuana, and other drugs from the Frenchmen Meat Market for at least the past 3-4 years.

Cooperating Witness #14 (CW14) previously worked in the neighborhood that was controlled by FnD. CW14 first met Travis Scott, a/k/a "Trap" or "Slim," in 2010, and CW14 began using heroin in 2012. CW14 would testify that he/she bought his/her heroin from Travis Scott. CW14 would testify that Travis Scott was the leader of FnD, and no one sold any drugs on the block without Travis Scott's approval. CW14 would testify that from 2010 to 2012, Travis Scott would sell bags containing approximately 0.2 grams of heroin for \$50. Travis Scott would sell approximately 20-30 of these bags per day, and he would sell heroin 6-7 days per week in and around the Frenchmen Meat Market. CW14 would testify that he/she sold four guns to Travis Scott in return for money and heroin. CW14 would testify that he/she saw **STANLEY SCOTT**, a/k/a "Stizzle," selling heroin at the Frenchmen Meat Market 6-7 days per week, and CW14 has seen **STANLEY SCOTT** with guns at the Frenchmen Meat Market. CW14 would identify **SHAWN SCOTT** as "Shizzle," and would testify that **SHAWN SCOTT** sold heroin and crack cocaine 6-7 days per week as a member of FnD. CW14 has seen **SHAWN SCOTT** holding firearms, including a Ruger 9mm handgun with an extended clip. CW14 would testify that **AKEIN SCOTT**, a/k/a "Keemy," was a member of FnD. **AKEIN SCOTT** would sell crack cocaine and heroin at the Frenchmen Meat Market 3-5 days per week. Usually **AKEIN SCOTT** would sell drugs in the afternoons and evenings after he attended school. CW14 would testify that he/she has also seen **AKEIN SCOTT** with handguns. CW14 would confirm that FnD members benefitted from food stamp fraud committed by the owners of the Frenchmen Meat Market who permitted customers to exchange EBT/food stamp credit for cash. These customers would sometimes purchase drugs from FnD members using that cash from the illicit EBT transaction.

In the course of this investigation, federal agents obtained search warrants for seized cell



phones from FnD members. Agents recovered various photographs and videos as a result of these search warrants. These photographs show members of FnD together. Specifically, one photograph shows Travis Scott, **AKEIN SCOTT**, **STANLEY SCOTT**, and Jeremiah Jackson showing FnD gang signs with their hands. Another photograph posted on Instagram shows Jeremiah Jackson, **SHAWN SCOTT**, and other FnD associates on a porch on Frenchmen Street near the Frenchmen Meat Market with a caption that reads, “Team us they need us man!” “Team Us” is another name used by FnD members to refer to themselves. Another photo shows several members of FnD showing off their “Team Us” tattoos. Another photograph shows Travis Scott standing next to his wife while he holds a semiautomatic handgun.

A video seized from an FnD associate’s cell phone shows Jeremiah Jackson and another FnD member boasting about making money from drug sales while they are standing near Frenchmen and North Derbigny Streets. Both Jeremiah Jackson and the other FnD member brag about “FnD” while holding cash. They state that they make their money daily at “the store,” referencing the Frenchmen Meat Market which is shown in the background of the video. Both Jeremiah Jackson and the other FnD member discuss “toting ratchets,” i.e., guns, and making “20 racks,” i.e., \$20,000, from drug sales. Jeremiah Jackson also speaks about FnD members who are either incarcerated or deceased.

Furthermore, the Government would present evidence of the following overt acts taken in furtherance of the conspiracy to engage in racketeering and drug distribution:

**Arrest of SHAWN SCOTT on June 26, 2006 (Relevant Conduct)**

On June 26, 2006, **SHAWN SCOTT** was arrested on the 1700 block of Frenchmen Street for possession with the intent to distribute crack cocaine. Due to citizen complaints of illegal activity on the 1700 block of Frenchmen Street, NOPD officers were patrolling the area

and observed **SHAWN SCOTT** sitting outside 1727 Frenchmen Street in New Orleans. Officers saw an older male approach **SHAWN SCOTT** and hand him currency. **SHAWN SCOTT** then walked with the older man between the two residences at 1727 and 1729 Frenchmen Street. Officers observed **SHAWN SCOTT** take an object out of his baseball cap and hand it to the older man. The older man took the object, examined it, and tucked it in his left sock. He then rode off on a bicycle towards North Claiborne Avenue. Officers saw **SHAWN SCOTT** walk back to the alleyway and remove a plastic bag from under a cinder block, remove an item, and then place the bag back under the cinder block. Officers approached and **SHAWN SCOTT** attempted to run away upon seeing the officers. **SHAWN SCOTT** was arrested after a short pursuit, however. Officers found a plastic bag containing suspected crack cocaine where **SHAWN SCOTT** was seen keeping a stash. Officers also recovered a piece of suspected crack cocaine inside **SHAWN SCOTT'S** baseball cap and \$66.00 in currency in his front pocket. The seized drugs were subsequently tested by the NOPD Crime Lab and determined to be cocaine. **SHAWN SCOTT** subsequently pleaded guilty to possession of cocaine on October 11, 2007, in Orleans Parish Criminal Court Case No. 467-637 "D."

#### **Arrest of SHAWN SCOTT on January 19, 2007 (Relevant Conduct)**

On January 19, 2007, **SHAWN SCOTT** was arrested on the 1700 block of Frenchmen Street. In response to citizen complaints of illegal activity in the area, NOPD detectives were patrolling the 1700 block of Frenchmen when they observed **SHAWN SCOTT** meeting with an unknown woman near the intersection of Frenchmen and North Derbigny Streets in New Orleans. The detectives observed the woman hand **SHAWN SCOTT** an amount of U.S. currency. **SHAWN SCOTT** then walked to the right side of the residence at 1719 Frenchmen

Street and removed a plastic bag from the gas meter. **SHAWN SCOTT** walked back to the woman and handed her an object. The woman then left the area. Based on their experience and observations, detectives believed that **SHAWN SCOTT** had just conducted a drug transaction. Detectives then watched **SHAWN SCOTT** enter a green four-door Oldsmobile. Detectives followed the vehicle for a short time and stopped it in the 1900 block of Orleans Avenue. Detective Darren Brazely detained **SHAWN SCOTT** and advised him of his *Miranda* rights. Detectives August Michel and Mike Cochran went to 1719 Frenchmen Street and opened the gas meter on the side of the residence where they had observed **SHAWN SCOTT** retrieve suspected narcotics. Inside the gas meter the detectives found a plastic bag containing numerous pieces of suspected crack cocaine. The seized drugs were subsequently tested by the NOPD Crime Lab and determined to be cocaine. **SHAWN SCOTT** subsequently pleaded guilty to possession of cocaine on October 11, 2007, in Orleans Parish Criminal Court Case No. 469-887 "D."

#### **Arrest of SHAWN SCOTT on May 2, 2007 (Relevant Conduct)**

On May 2, 2007, **SHAWN SCOTT** was arrested at 1721 Frenchmen Street along with Gralen Benson and Michael Johnson after citizens complained of heroin and crack cocaine sales in the neighborhood. NOPD narcotics detectives observed **SHAWN SCOTT**, Gralen Benson, and Michael Johnson conducting hand-to-hand drug transactions and using a stash location in between 1719 and 1721 Frenchmen Streets. Detectives seized approximately 27 grams of suspected crack cocaine, 23 foils of suspected heroin, and a black digital scale from the alley between 1719 and 1721 Frenchmen Street. The seized drugs were subsequently tested by the NOPD Crime Lab and determined to be cocaine (27.7 grams) and heroin. Detectives also seized \$641.00 in U.S. currency from **SHAWN SCOTT**. **SHAWN SCOTT** pleaded guilty to

possession of crack cocaine and attempted possession of heroin on October 11, 2007, in Orleans Parish Criminal Court Case No. 470-862 "D."

**Arrest of SHAWN SCOTT on December 8, 2007 (Relevant Conduct)**

On December 8, 2007, NOPD officer arrested **SHAWN SCOTT** for possession with the intent to distribute heroin. Officers patrolling the 1700 block of Frenchmen Street observed **SHAWN SCOTT** kneeling down in the left side alleyway of a known narcotics outlet at 1718 Frenchmen Street. The officers saw **SHAWN SCOTT** conceal a white object underneath the residence. The officers, believing that **SHAWN SCOTT** was hiding contraband, approached **SHAWN SCOTT** and detained him. Officer Greg Lapin then walked down the alley way to where the officers had seen **SHAWN SCOTT** hide the suspected narcotics. Officer Lapin discovered a clear plastic bag containing uncooked rice and several pieces of tin foil containing a white powder substance. The substance field-tested positive for heroin. Pursuant to search incident to arrest, officers recovered \$612.00 inside **SHAWN SCOTT'S** right front pocket. **SHAWN SCOTT** subsequently pleaded guilty to possession with the intent to distribute heroin on June 4, 2008, in Orleans Parish Criminal Court Case No. 475-717 "C."

**Shooting on March 22, 2012, by AKEIN SCOTT, STANLEY SCOTT, and Jeremiah Jackson (Counts 7 and 8)**

On March 22, 2012, C.L, L.W., and T.L. were driving on North Robertson Street near Frenchmen Street in New Orleans. This location is near FnD's turf. C.L, L.W., and T.L. were all associates of Cornell Joseph, a/k/a "Shoe." Cornell Joseph was a rival drug dealer of FnD. **AKEIN SCOTT, STANLEY SCOTT,** and Jeremiah Jackson saw C.L, L.W., and T.L. in the vehicle. **AKEIN SCOTT, STANLEY SCOTT,** and Jeremiah Jackson then began firing handguns at C.L, L.W., and T.L. C.L, L.W., and T.L. then fled the scene in their car. NOPD officers responded to the scene at North Robertson and Frenchmen Streets. Officers recovered

twenty-four .40 caliber spent casings and fourteen 9mm spent casings from the scene.

In a subsequent interview with ATF agents, Cooperating Witness # 15 (CW15), an eyewitness and member of a rival drug gang, identified **AKEIN SCOTT, STANLEY SCOTT,** and Jeremiah Jackson as the persons who were shooting at the vehicle. CW15 knew **AKEIN SCOTT, STANLEY SCOTT,** and Jeremiah Jackson through numerous prior interactions with them. CW15 would testify at trial that **AKEIN SCOTT, STANLEY SCOTT,** and Jeremiah Jackson fired guns at the vehicle because C.L, L.W., and T.L. were associated with Cornell Joseph. C.L, L.W., and T.L. were not injured during this shooting

Cooperating witnesses, among them CW3, CW10, CW11, CW12, CW14, and CW15, would confirm that Travis Scott and Cornell Joseph had a long-running dispute regarding territory for drug sales.

On October 30, 2013, Daniel Jackson, an associate of FnD, was arrested in possession of a firearm at a residence in New Orleans, Louisiana. Daniel Jackson is the brother of Jeremiah Jackson. The firearm was identified as a Ruger 9mm pistol, model P89, serial number 310-34487.

The NOPD Crime Lab subsequently performed a ballistics analysis of the casings recovered from North Robertson and Frenchmen Streets on March 22, 2012, and the Ruger pistol recovered from Daniel Jackson on October 30, 2013. The National Integrated Ballistic Information Network (NIBIN) system determined a potential match between 9mm casings recovered at the scene and the Ruger pistol recovered from Daniel Jackson. NOPD Firearms Examiner Meredith Acosta performed a ballistics analysis between the Ruger pistol and one of the 9mm casings. Firearms Examiner Acosta confirmed the match, determining that the 9mm casing recovered from the scene at North Robertson and Frenchmen Streets was fired by the

Ruger pistol that was recovered from Daniel Jackson.

By pleading guilty to this shooting, **AKEIN SCOTT** and **STANLEY SCOTT** specifically admit that they participated in this crime for the purpose of maintaining and increasing their reputation and position with the FnD criminal street gang. They further admit that they discharged their firearms during and in relation to the drug conspiracy and racketeering conspiracy of which they were members.

**Shooting on March 25, 2012, by Travis Scott and AKEIN SCOTT (Count 9)**

On March 25, 2012, Travis Scott and **AKEIN SCOTT** observed R.W. driving a silver Nissan Maxima on N. Claiborne Street near Frenchmen Street in New Orleans. Cooperating witnesses would testify that R.W. was a known associate of Cornell "Shoe" Joseph, a rival drug dealer of Travis Scott and FnD. CW12 would testify that he/she left a store on Claiborne Ave. and was walking across the neutral ground when he/she heard shots being fired. CW12 observed Travis Scott and **AKEIN SCOTT** holding and aiming handguns at a gray/silver Nissan Maxima. CW12 then saw Travis Scott and **AKEIN SCOTT** fire their handguns at R.W. R.W. was not injured during this shooting.

NOPD officers recovered .40 caliber shell casings from the scene at N. Claiborne Street and Frenchmen Street. The NIBIN system determined a potential match with other .40 caliber shell casings that were recovered from an August 4, 2012, shooting that occurred near the intersection of Frenchmen Street and N. Derbigny Street outside the Frenchmen Meat Market. NOPD Firearms Examiner Meredith Acosta performed a ballistics analysis between the .40 caliber shell casings recovered from the March 25, 2012, shooting and the August 4, 2012, shooting. Firearms Examiner Acosta confirmed the match, determining that the same firearm was used to fire the .40 caliber bullets used in both shootings. As set forth more fully below,

witnesses identified FnD members as the perpetrators of the August 4, 2012, shooting, which further corroborates the proffered testimony that Travis Scott and **AKEIN SCOTT** shot at R.W. on March 25, 2012.

By pleading guilty to this shooting, **AKEIN SCOTT** specifically admits that he participated in this crime for the purpose of maintaining and increasing his reputation and position with the FnD criminal street gang. He further admits that he discharged his firearm during and in relation to the drug conspiracy and racketeering conspiracy of which he was a member.

**Shooting on July 16, 2012, by STANLEY SCOTT and AKEIN SCOTT (Count 11)**

On July 16, 2012, C.L., T.H., and S.G. were in a burgundy G35 Infiniti traveling near the intersection of Franklin and Gentilly Streets in New Orleans. Cooperating witnesses would testify that C.L., T.H., and S.G. were associates of Cornell Joseph, a/k/a "Shoe," a rival drug dealer of Travis Scott and FnD. C.L. was driving the Infiniti and came across two cars, a Volvo and a gray Corolla, being driven by members of FnD. Cooperating witnesses would testify that two FnD members exited the two cars and began firing on the Infiniti. C.L. sustained gunshot wounds and then accelerated his car to escape from the area. CW15 would testify that a third person standing further away also fired on the Infiniti as it passed. CW15 would testify that he/she could not identify the shooters but that the first two persons who shot appeared to have the same height and build as the Scott brothers.

T.H. and S.G. were not injured during this shooting. C.L. was shot in the left knee, left shoulder blade, right hand, and back. C.L. went to University Hospital for treatment. At the hospital, C.L. initially gave a false name and told NOPD officers that the shooting occurred at Magazine Street and Louisiana Avenue in New Orleans. C.L. gave this false information because he had a warrant for his arrest. Therefore, NOPD officers did not recover any shell casings.

CW13 would testify that he was in a Volvo with **AKEIN SCOTT**. **AKEIN SCOTT** was initially driving the vehicle. Travis Scott was driving a second vehicle, a gray Toyota Corolla, in front of the Volvo. The passengers in the Corolla were **STANLEY SCOTT** and **SHAWN SCOTT**. CW13 first saw **STANLEY SCOTT** exit the lead vehicle and begin firing at the burgundy Infiniti. CW13 then saw **AKEIN SCOTT** exit the vehicle and start firing into the Infiniti. CW13 would testify that **AKEIN SCOTT** discharged nearly his whole magazine (30 rounds). Travis Scott yelled for CW13 to drive away. CW13 jumped into the driver's seat and drove off.

By pleading guilty to this shooting, **AKEIN SCOTT** and **STANLEY SCOTT** specifically admit that they participated in this crime for the purpose of maintaining and increasing their reputation and position with the FnD criminal street gang. They further admit that they discharged their firearms during and in relation to the drug conspiracy and racketeering conspiracy of which they were members.

**August 4, 2012, Robbery by Travis Scott and Shooting by STANLEY SCOTT, SHAWN SCOTT, and AKEIN SCOTT (Count 13)**

On August 4, 2012, R.C. walked into Frenchmen Meat Market at the corner of Frenchmen and N. Derbigny Streets while in possession of a handgun. R.C. sought to purchase either marijuana or crack cocaine. Travis Scott was inside the Frenchmen Meat Market and noticed that R.C. was armed. R.C. was then lured outside by members of FnD where Travis Scott and other FnD members physically assaulted R.C. and took the firearm from him. Later that day, R.C. returned in a burgundy SUV traveling the wrong way down the one-way street in front of the Frenchmen Meat Market. A shootout occurred with multiple members of FnD. A 14-year old girl, J.B., was struck by a stray bullet while her vehicle was traveling down North Claiborne Avenue near the scene of the shootout.



NOPD officers responded to the scene at Frenchmen and N. Derbigny Streets. Officers also recovered a total of 22 spent shell casings (identified as 9mm and .40-caliber) and 4 bullet fragments from the area around Frenchmen Meat Market. Officers also located R.C. and searched the vehicle in which he was riding. Officers recovered one .380-caliber spent shell casing from that vehicle.

CW5 was inside the Frenchmen Meat Market during this incident. CW5 would testify at trial that he/she saw Travis Scott take R.C. outside, punch him repeatedly, and then forcibly take the handgun from R.C. Travis Scott told CW5 that R.C. was looking for drugs. Travis Scott said that he saw that R.C. had a gun, so he (Travis Scott) beat up R.C., took the gun, and kicked him out of the store. Later that day, CW5 heard gunfire outside the store. After the gunfire subsided, CW5 looked up at the surveillance monitor and saw **AKEIN SCOTT** pointing a handgun outside.

CW13 was also in the store when he observed Travis Scott beat up R.C. and take his gun. CW13 then walked around the corner from the store. When the shooting erupted, CW13 saw **SHAWN SCOTT** on a bicycle shooting at R.C.'s vehicle. CW13 would testify that he/she saw **AKEIN SCOTT**, **STANLEY SCOTT**, and **SHAWN SCOTT** all armed with guns that day.

CW10 would testify that he was present in the store and saw R.C. enter with a long coat on. CW10 saw a firearm sticking out of R.C.'s coat. CW10 then saw Travis Scott beat up R.C. and take the gun from him. When R.C. returned in a car, CW10 saw **AKEIN SCOTT** and **STANLEY SCOTT** fire handguns at the car.

CW8 will testify that he/she saw R.C. enter the store with a handgun with an extended magazine. CW8 saw Travis Scott approach R.C. Travis Scott and R.C. walked outside the store where Travis punched R.C. and pulled the gun away from him. CW8 saw another FnD member

immediately pull a gun and prepare to shoot R.C., but Travis Scott stopped the FnD member from shooting R.C., saying "Don't do that here." They then allowed R.C. to leave. Later that day, CW8 saw a burgundy SUV coming down the street. CW8 then saw Travis Scott and other FnD members running across the street while **SHAWN SCOTT** was riding a bicycle. Gunfire erupted at that point, during which **SHAWN SCOTT** fell off his bicycle. CW8 would testify that he saw **AKEIN SCOTT** shooting at the vehicle.

Witness testimony would also show that, at the time of this shooting, D.B. and her daughter, J.B., were in a silver 1999 GMC Yukon SUV traveling east on North Claiborne Avenue and approaching Elysian Fields Avenue. As they passed Frenchmen Street, (immediately prior to Elysian Fields Avenue), J.B. was struck in the leg by a .40 caliber bullet. Crime scene photographs taken at University Hospital confirm a bullet hole in the driver's side rear door. The .40 caliber bullet is the same caliber as the casings recovered outside the Frenchmen Meat Market where FnD members were seen shooting at R.C.

NOPD Crime Scene technicians also took photographs of R.C.'s vehicle, which show multiple bullet holes in the rear of the vehicle. R.C. did not sustain any gunshot wounds during this incident.

The shell casings that were recovered by NOPD officers in the course of this investigation were entered into the NIBIN system for possible matching. The NIBIN system determined that the .40 caliber shell casings that were recovered outside of the Frenchmen Meat Market on August 4, 2012, were a possible match to a shooting that occurred at N. Claiborne Street and Frenchmen Street on March 25, 2012. NOPD Firearms Examiner Meredith Acosta performed a ballistics analysis between the .40 caliber shell casings recovered from the March 25, 2012, shooting and the August 4, 2012, shooting. Firearms Examiner Acosta confirmed the match, determining

that the same .40 caliber firearm was used in both shootings.

By pleading guilty to this shooting, **AKEIN SCOTT, STANLEY SCOTT, and SHAWN SCOTT** specifically admit that they participated in this crime for the purpose of maintaining and increasing their reputation and position with the FnD criminal street gang. They further admit that they discharged their firearms during and in relation to the drug conspiracy and racketeering conspiracy of which they were members.

**Arrest of STANLEY SCOTT on September 5, 2012 (Relevant Conduct)**

On September 5, 2012, NOPD officers were on patrol in the area of North Derbigny Street in New Orleans. Officers observed **STANLEY SCOTT** engage in a suspected hand-to-hand narcotics transaction near the intersection of St. Anthony and N. Derbigny Streets. This intersection is approximately two blocks from the intersection of Frenchmen and N. Derbigny Streets. As the officers approached, **STANLEY SCOTT** saw the officers. **STANLEY SCOTT** then put an object in his hand into his pocket then turned around and moved swiftly into the convenience store at St. Anthony and N. Derbigny Streets. The officers exited their vehicle, walked into the store, and detained **STANLEY SCOTT**. Detective Todd Durel conducted a pat down of **STANLEY SCOTT** and felt packaged narcotics in **STANLEY SCOTT'S** right front pants pocket. Detective Durel recovered a plastic bag containing thirteen smaller clear plastic bags, all of which contained suspected heroin. The suspected narcotics were subsequently tested by the NOPD Crime Lab and determined to be heroin.

On September 5, 2012, **STANLEY SCOTT** made a phone call from Orleans Parish Prison to an unknown male. During the call, **STANLEY SCOTT** says that "Slim" and others would be paying his bond. "Slim" is a reference to Travis Scott. **STANLEY SCOTT** further says that "them people" got his "yeah," but that "Shawn" kept "my ratchet" because he (Shawn) threw it in the store. Witnesses would testify that "them people" is a reference to the police; "yeah" is used

by FnD members to refer to drugs or a firearm, and “ratchet” is a slang term for a gun. Therefore, **STANLEY SCOTT** is referring to the fact that the police got his (**STANLEY SCOTT’S**) heroin while **SHAWN SCOTT** kept **STANLEY SCOTT’S** gun because he (**SHAWN SCOTT**) threw it inside a store nearby.

On March 12, 2013, **STANLEY SCOTT** pleaded guilty to possession with the intent to distribute heroin in Orleans Parish Criminal Court Case No. 513-652 “H.”

**Arrest of STANLEY SCOTT on November 29, 2012 (Relevant Conduct)**

On November 29, 2012, NOPD officers were on patrol in the 1400 block of Frenchmen Street. The officers received information from a confidential informant that a group of people were selling drugs from an abandoned house. As the officers approached the 1600 block of Frenchmen Street, the officers observed a group of individuals standing outside an abandoned residence at 1628 Frenchmen Street. As the officers approached, **STANLEY SCOTT** fled on foot through the alley of the abandoned residence. Officer Lawrence Weathersby gave chase. **STANLEY SCOTT** ran through an open rod iron gate and pushed the iron gate towards Officer Weathersby, causing a minor laceration. As **STANLEY SCOTT** entered the rear yard of 1628 Frenchmen Street, **STANLEY SCOTT** retrieved an olive and black firearm from his right coat pocket and threw it to the ground. The firearm came to rest against a fence in the rear yard. Officer Weathersby followed **STANLEY SCOTT** through another fence and apprehended him at the intersection of Frenchmen and North Derbigny Streets. During a search incident to arrest of **STANLEY SCOTT**, officers found a bottle of cough syrup with codeine. On March 12, 2013, **STANLEY SCOTT** pleaded guilty to possession of a firearm with a controlled dangerous substance in Orleans Parish Criminal Court Case No. 514-693 “H.”

### **Arrest of AKEIN SCOTT on March 5, 2013 (Relevant Conduct)**

On March 5, 2013, NOPD officers on patrol observed **AKEIN SCOTT** sitting in front of the Frenchmen Meat Market. When Scott saw officers, he grabbed his waistband and went into the store. Officers went into the store, observed a bulge, and conducted a *Terry* pat down of **AKEIN SCOTT** which led to the discovery of a handgun. An NCIC check revealed that the firearm was reported stolen out of St. Charles Parish. **AKEIN SCOTT** was arrested and placed in the rear of an NOPD cruiser for transport.

Officers took **AKEIN SCOTT** to NOPD Central Lockup. After removing **AKEIN SCOTT** from the cruiser, officers checked the backseat of the patrol car and found a clear plastic bag containing heroin. Officers would testify that it is their practice to check their patrol car for contraband before their patrol and after removing any arrestee from the rear seat; therefore, **AKEIN SCOTT** is the only source of the heroin found in the rear seat.

The suspected narcotics tested positive for heroin. The firearm was determined to be a Springfield Arms model XD-40, .40 caliber handgun, serial number XD447112.

### **Jail Phone Call by AKEIN SCOTT on March 28, 2013 (Relevant Conduct)**

After **AKEIN SCOTT'S** arrest on March 5, 2013, he made several phone calls from Orleans Parish Prison. All of these phone calls were recorded by the Orleans Parish Sheriff's Office, and there is a warning prior to every call that the call is being monitored and recorded. On March 28, 2013, **AKEIN SCOTT** made a phone call to D.B., an associate of FnD. During the phone call, D.B. tells **AKEIN SCOTT** that C.L. approached **SHAWN SCOTT** saying that he (C.L.) wanted "peace." D.B. reported that C.L. asked **SHAWN SCOTT** to have "Slim" (Travis Scott) call C.L. back. (C.L. was an associate of Cornell "Shoe" Joseph, a rival drug dealer of Travis Scott and FnD). On the recorded call, **AKEIN SCOTT** gets angry that **SHAWN SCOTT**

spoke with C.L. D.B. replies that **SHAWN SCOTT** did not have a “yeah” on him (“yeah” in this context is slang for firearm). **AKEIN SCOTT** replies that “that’s the problem” with **SHAWN SCOTT**, i.e., that **SHAWN SCOTT** does not carry a gun with him. D.B. then tells Akein that they (FnD) should tell C.L. that if he (C.L.) wants peace, then he (C.L.) should throw a “birthday party” for his (C.L.’s) “partner.” A “birthday party” is slang for murder, and therefore D.B. is suggesting that C.L. can have peace if C.L. kills one of his own associates with whom FnD has a beef. **AKEIN SCOTT** replies to D.B. that C.L. should throw a birthday party for “both of them,” meaning that C.L. should have to kill two of his own associates. D.B. replies, “Yeah that’s what I meant.”

#### **Recovery of Heroin from SHAWN SCOTT’S Vehicle on April 19, 2013 (Relevant Conduct)**

On April 19, 2013, NOPD Officer Justin Brown attempted to stop a white Nissan Maxima because it did not have a visible license plate. The vehicle did not stop until it reached the intersection of S. Roman and Delachaise Streets in New Orleans, where Officer Brown saw the driver exit the car and begin running on foot. The driver had a baseball hat on his head. Officer Brown saw the driver’s face and saw that the driver had a handgun. As the driver fled on foot towards the rear of 3618 S. Roman, the driver’s hat fell off his head. The driver was able to flee from the scene with the firearm.

Officer Brown seized the baseball cap that fell from the driver’s head. The officer returned to the vehicle and found twenty-one (21) plastic bags containing tan powder, and another plastic bag containing nine (9) smaller bags that each contained tan powder. The vehicle was determined to be registered to “**SHAWN SCOTT**” of 3618 South Roman Street, New Orleans, Louisiana. The officer viewed a booking photo of **SHAWN SCOTT** and identified him as the driver who fled from the scene.

Officers recovered hairs that were left in the baseball cap that fell off the driver while he fled. Those hairs were examined for DNA by Louisiana State Police laboratories. The LSP lab determined that the hairs from the cap were a DNA match to **SHAWN SCOTT**. The thirty bags seized from **SHAWN SCOTT**'S vehicle were tested by the NOPD Crime Lab, which determined that all of the bags contained heroin.

**Shooting by AKEIN SCOTT and SHAWN SCOTT on Mother's Day, May 12, 2013  
(Count 19)**

On Mother's Day 2013, **AKEIN SCOTT** and **SHAWN SCOTT** fired handguns into a second line parade in New Orleans, Louisiana. They intended to kill a rival gang member, J.T., with whom they had a "beef." J.T. was struck five times. In attempting to kill J.T., **AKEIN SCOTT** and **SHAWN SCOTT** also shot A.L., C.W., L.P., C.W., L.E., D.C., H.B., J.W., K.A., K.B., L.R., M.H., R.P., T.M., T.J., T.R., V.G., W.H., and D.C. All twenty victims sustained gunshot wounds, ranging from bullet-graze wounds to life-threatening injuries. At least four victims required multiple surgeries as a result of the shooting.

Immediately after the shooting, NOPD officers recovered surveillance footage from a neighbor with a personal video surveillance system outside his home. The video shows **AKEIN SCOTT** arriving on the scene on foot while the second-line parade goes by. **AKEIN SCOTT** stands close to the house, apparently lying in wait as the parade passes. When his intended target appears, **AKEIN SCOTT** quickly approaches the parade, pulls a firearm from his shirt, and fires into the crowd. His brother, **SHAWN SCOTT**, is outside the view of the camera. Cooperating witnesses would identify **AKEIN SCOTT** as the person on the video shooting a gun into the second line parade.

NOPD officers believed that J.T. could have been the target due to his multiple wounds (total of five bullet wounds). In order to determine whether J.T. fired a weapon, NOPD officers

performed a gunshot residue test on J.T. The results of the test were negative for gunshot residue. Cooperating witnesses would testify that **AKEIN SCOTT** and **SHAWN SCOTT'S** target was J.T., an associate of the Prieur Columbus Boys, or "PCB," a gang that sells drugs in the neighborhood surrounding the intersection of Prieur and Columbus Streets, New Orleans. Witnesses would testify that PCB members would not be permitted to sell drugs in the FnD turf, and likewise FnD members would face violence if they attempted to sell drugs in the PCB neighborhood. Furthermore, witnesses would testify that the May 12th shooting occurred in an area where FnD members could operate safely because they were friendly with individuals who sold drugs at Frenchmen and Villere Streets.

NOPD Crime Scene officers recovered fourteen spent 9mm caliber shell casings from the scene. They also recovered two copper jacketed projectiles and four bullet fragments. NOPD Firearms Examiner Meredith Acosta determined that the fourteen spent shell casings, the two copper jacketed projectiles, and two of the bullet fragments were fired by the same weapon. Firearms Examiner Acosta further determined that the other two recovered bullet fragments were fired by a different weapon.

United States Marshals and NOPD officers arrested **AKEIN SCOTT** and three other individuals on May 15, 2013, at a house in New Orleans East. On May 16, 2013, **SHAWN SCOTT** was arrested at his apartment at 9696 Haynes Boulevard, New Orleans. As officers approached the apartment building, **SHAWN SCOTT** observed the officers coming and attempted to flee as he discarded a plastic bag containing heroin. Officers obtained a search warrant for **SHAWN SCOTT'S** apartment. During a search of **SHAWN SCOTT'S** apartment, officers recovered **AKEIN SCOTT'S** identification card, a digital scale, razor blades, and Goodsense sandwich bags. Officers also seized one plastic bag with 50 smaller baggies



containing suspected heroin and a magnetic “Hide a Key” magnetic box that held a plastic bag containing ten smaller bags with suspected heroin. Cooperating witnesses would testify that “Hide a Key” boxes were regularly used by Travis Scott and other members of FnD to hide heroin underneath the metal shelves of the Frenchmen Meat Market. The NOPD Crime Lab tested the suspected heroin from the 60 plastic bags that were seized and determined that they did contain heroin.

NOPD officers and federal agents interviewed eyewitnesses who were at the parade and saw the shooting occur on May 12, 2013. Cooperating Witness #16 (CW16) would testify that he/she saw the shooting and he/she would identify **AKEIN SCOTT** and **SHAWN SCOTT** as the individuals who shot into the second-line parade. Cooperating Witness #17 (CW17) would testify that he/she observed **AKEIN SCOTT** shooting into the parade. Cooperating Witness #18 (CW18) would testify that he/she saw **AKEIN SCOTT** shooting into the parade while he/she was standing at the intersection of Frenchmen and Villere Streets. CW18 would testify that he/she also heard a second gun firing, but he/she did not see the second shooter.

CW12 and CW13 would testify that **AKEIN SCOTT** saw J.T. at a gas station approximately 30-40 minutes before the shooting occurred. CW13 would testify that **AKEIN SCOTT** told him/her to retrieve a gun for him (**AKEIN SCOTT**) and bring it back. CW13 retrieved a gun that was stashed by members of FnD and brought it back to **AKEIN SCOTT**. Moments later, **AKEIN SCOTT** and **SHAWN SCOTT** began shooting into the second line parade.

Cooperating witnesses would further testify that **AKEIN SCOTT** went to a barbeque at a house in New Orleans East on May 12, 2013, after the shooting. While at the barbeque, witnesses overheard **AKEIN SCOTT** talking on a cell phone and saying that “Shawn’s stupid ass keeps

falling down when he shoots.” Witnesses understood this to be a reference to **SHAWN SCOTT**.

Witnesses will further testify that, once **AKEIN SCOTT** was wanted by police, Travis Scott directed two of his cousins to move **AKEIN SCOTT** prior to his arrest on May 15, 2013. On this date, **AKEIN SCOTT** was staying at **SHAWN SCOTT’S** residence at 9696 Haynes Boulevard. Cooperating witnesses would testify that N.Y., B.H., and J.A. picked up **AKEIN SCOTT** and drove him to the residence in New Orleans East where **AKEIN SCOTT** was subsequently arrested by U.S. Marshals. Cooperating witnesses would testify that **AKEIN SCOTT** admitted that he “messed up” in phone conversations with **TRAVIS SCOTT**. After **AKEIN SCOTT’S** arrest, officers transported him to the New Orleans Parish Prison. Cooperating Witness #21 (CW21) would testify that **AKEIN SCOTT** admitted to him/her in jail that he had committed the shooting.

After the arrest of **AKEIN SCOTT** and **SHAWN SCOTT**, Travis Scott sought to intimidate witnesses whom he thought were cooperating with the police. Cooperating witnesses would testify that Travis Scott spoke with N.Y. and B.H. after the shooting. On or about May 18, 2013, Travis Scott spoke to N.Y. on the phone and told him/her that he (Travis Scott) knew N.Y. was “talking” which resulted in **AKEIN SCOTT** and **SHAWN SCOTT** going to jail. On or about July 4, 2013, Travis Scott spoke to B.H., and told him/her, “Let me find out you ratting. Let me find out you breaking down.” N.Y. and B.H. understood these statements to be threats to discourage them from speaking with law enforcement about the shooting on May 12, 2013.

CW7 would testify that he/she spoke with Travis Scott after the shooting at some time in July or August 2013. The conversation occurred in the neighborhood of Frenchmen and North Derbigny Streets, New Orleans. CW7 asked Travis Scott why his brothers had committed the Mother’s Day shooting. Travis Scott replied, “If I see someone I’m beefing with, I’m going to do

it right then and there too.” Travis Scott then said, “They [the police] don’t have anything on my brother and them.”

By pleading guilty to this shooting, **AKEIN SCOTT** and **SHAWN SCOTT** specifically admit that they participated in this crime for the purpose of maintaining and increasing their reputation and position with the FnD criminal street gang. They further admit that they discharged their firearms during and in relation to the drug conspiracy and racketeering conspiracy of which they were members.

#### **Search Warrant on August 20, 2013, at the Frenchmen Meat Market (Relevant Conduct)**

On August 20, 2013, ATF agents executed a federal search warrant at 1641 Frenchmen Street, the Frenchmen Meat Market. During that search, agents seized a surveillance video tape. The tape shows that between August 16 and August 20, 2013, members of the FnD gang are present inside the store every day making numerous hand-to-hand drug transactions. FnD members Travis Scott, Brian Benson, Gralen Benson, Jeremiah Jackson, Richmond Smith, and Crystal Scott can be seen conversing with each other, making numerous hand-to-hand transactions, directing customers to each other, and using drug “stashers” inside and outside of the store. (At this time, Stanley Scott, Shawn Scott, and Akein Scott were incarcerated). The video shows Travis Scott inside the store each day from August 16th through August 19th, the day that he flew back to Kansas City, Missouri. During this time, Travis Scott can be seen conducting approximately 20-30 hand-to-hand transactions per day while he is in the store. The surveillance video also shows customers using EBT cards to exchange food stamps for cash from store workers, and then several customers used that cash to buy drugs from FnD members.

In one instance from the Frenchmen Meat Market surveillance video, on August 16, 2013, Travis Scott receives money from an unknown male while inside the store. Travis Scott

then speaks briefly with Jeremiah Jackson. Jeremiah Jackson then runs outside in the rain across the street from the Frenchmen Meat Market to a stash location. Jeremiah Jackson returns a minute later and hands several small objects to the man who is waiting in the store next to Travis Scott. The small objects are packaged in a manner consistent with street-level packaging for heroin and crack cocaine.

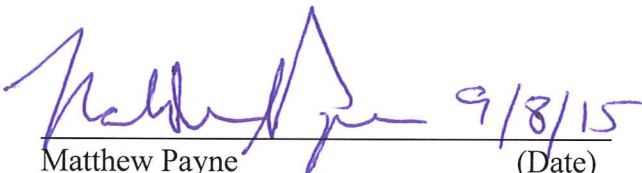
The video surveillance shows that Travis Scott and other FnD members used several locations in the store to stash illegal drugs. Travis Scott is seen using a “Hide a Key” magnetic box to conceal small amounts of illegal drugs underneath the metal shelves in the Frenchmen Meat Market. This corroborates cooperating witness testimony that “Hide a Key” boxes were used by Travis Scott and other members of FnD to hide heroin and other drugs underneath the metal shelves of the Frenchmen Meat Market.


The video surveillance also shows that on August 20th, Jeremiah Jackson walks behind the store counter and hands an item to a store worker. Jeremiah Jackson then walks out of the store with other FnD members. Minutes later, federal agents executed the search warrant and discovered two firearms behind the store counter. Cooperating witnesses would testify that the item that Jeremiah Jackson handed to the store worker was one of the handguns that was subsequently found behind the counter by ATF agents. Federal agents also recovered four bags of suspected heroin from a safe behind the store counter. The suspected narcotics were tested by Drug Enforcement Administration (DEA) laboratories and determined to be heroin with a net weight of 12.5 grams.

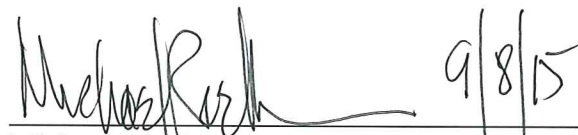
The government and defendants **STANLEY SCOTT, SHAWN SCOTT, and AKEIN SCOTT** agree and stipulate for sentencing purposes that the Government could prove that the amount of drugs that was distributed and possessed with the intent to be distributed directly by them and other co-conspirators in the FnD gang during the course of the conspiracy was more than one kilogram of a mixture or substance containing a detectible amount of heroin and more than 280 grams of a mixture or substance containing a detectible amount of cocaine base (“crack cocaine”).


Limited Nature of Factual Basis

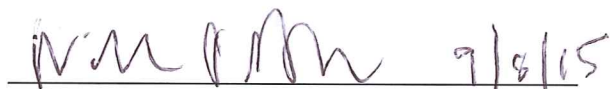
This proffer of evidence is not intended to constitute a complete statement of all facts known and described by **STANLEY SCOTT, SHAWN SCOTT, and AKEIN SCOTT** to the Government, but rather it is a minimum statement of facts intended to prove the necessary factual predicate for the guilty plea. The limited purpose of this proffer is to demonstrate that there exists a sufficient legal basis for **STANLEY SCOTT'S, SHAWN SCOTT'S, and AKEIN SCOTT'S** pleas of guilty to the charged conspiracies and substantive counts and to inform the Court of some of the relevant conduct in this case.

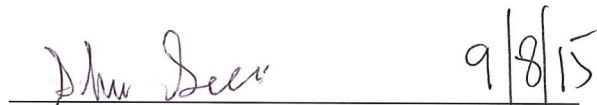
  
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